

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

_____)	
JOHN HANCOCK LIFE INSURANCE)	
COMPANY, JOHN HANCOCK)	
VARIABLE LIFE INSURANCE)	
COMPANY, and MANULIFE INSURANCE)	
COMPANY (f/k/a INVESTORS)	
PARTNER LIFE INSURANCE)	
COMPANY),)	CIVIL ACTION NO. 05-11150-DPW
)	
Plaintiffs,)	
)	
v.)	
)	
ABBOTT LABORATORIES,)	
)	
Defendant.)	
_____)	

AFFIDAVIT OF DEBORAH J. DION

I, Deborah J. Dion, hereby state under oath that:

1. I am a Senior Litigation Paralegal with the law firm Choate, Hall & Stewart ("Choate"). I have worked on behalf of the Plaintiffs on the above-captioned matter.

2. Defendant Abbott Laboratories, Inc. ("Abbott") objects to the Exhibits listed in attached Schedule A on grounds, among others, of "authentication." (See John Hancock's Agreed To and Objected To Exhibit Lists, filed January 28, 2008.)

3. Each Exhibit listed on Schedule A has been provided to John Hancock by Abbott, and purports to be a document created by Abbott, or an agent or representative of Abbott.

4. The Exhibits designated as PLs' LE, LK, LL, NP, NR, NS, NT, NZ, OA, OB, OJ, OK, OL, and PV are true and accurate copies of: (a) documents made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person or persons at Choate with knowledge of those matters; (b) documents made in the course of Choate's regularly conducted business; and (c) documents kept by Choate in the course of Choate's regularly conducted business.

5. The Exhibits designated as PLs' CG, DO, and DW are true and accurate copies of documents produced by Constella Group LLC to John Hancock on November 14, 2006 in response to a Subpoena served by John Hancock, dated October 16, 2006.

6. The Exhibits designated as PLs' FC, FH, FI, FL, FR, FS, FW, GW, GX, QO, and QP are true and accurate copies of documents produced by McKinsey & Company to John Hancock in August 2007 in response to a Subpoena served by John Hancock, dated April 27, 2007.

7. The Exhibit designated as PL's GU is a true and accurate copy of a document produced by Dr. Paul Andrews to John Hancock on March 28, 2007.

8. The exhibits designated as PLs' KF, KG, KH, KI are true and accurate copies of print-outs from Abbott's website as of January 17, 2008 and are publicly available.

9. As of January 26, 2008, exhibits designated as PLs' QD, QE, QF and QG were available on Abbott's website at www.abbott.com. With the assistance of its Information Technologies staff, John Hancock, captured PLs' QD, QE, QF and QG as they appear on Abbott's website and preserved them in electronic format for possible use at trial.

10. The exhibit designated as PLs' QA is a true and accurate copy of Abbott's Form 10-K for the year ended December 31, 2006.

Signed under the pains and penalties of perjury this 28 day of January, 2008.

/s/ Deborah J. Dion

Deborah J. Dion

CERTIFICATE OF SERVICE

I hereby certify that this document is being filed with the Court through the ECF system and that a copy will be sent electronically to counsel for defendant through the ECF system on January 28, 2008.

/s/ Richard C. Abati
Richard C. Abati (BBO No. 651037)

Schedule A
Abbott Authentication Objections

Trial Exhibit	Date	Description	Bates Nos.
A	12/9/1999	MMPI Working Group Meeting Minutes	ABBT0053710-11
B	3/9/2000	Matrix Metalloproteinase Inhibitors Project - Discovery Development Candidate Meeting	ABBT0141929-83
C	7/14/2000	2001 Plan Assumption Memo	ABBT0037399-463
D	Aug-00	July 2000 Top Issues	ABBT0017616-19
F	11/00/2000	Information for Clinical Investigators, ABT-518	ABBT0055691-772
G	11/8/2000	Oncology Portfolio Analysis Inputs - Project List, Product Profiles and Probabilities of Technical Success - Draft for Team Review, November 8, 2000	ABBT292350, ABBT292365, ABBT302701, ABBT302721
H	1/11/2001	MMPI Working Group Meeting, Meeting Objective: ABT-518 Program Update	ABBT0045274-276
I	2/1/2001	ABT-518 Monthly Report, February 2001	ABBT0000343-48
J	2/1/2001	ABT-518 Descriptive Memorandum, February 2001	ABBT0004032-39
K	2/4/2001	Oncology Status Report	ABBT0045333-35
L	3/1/2001	ABT-518 Monthly Report, March 2001	ABBT0000349-53
N	3/8/2001	MMPI Monthly Meeting Agenda	ABBT0045253
O	3/8/2001	MMPI Working Group Meeting Minutes	ABBT300143-44
P	3/9/2001	Oncology Status Report	ABBT0045324-326
Q	3/9/2001	Letter from Tom Capetan to Dr. Nisen re: Report on ABT 518-Evaluation in Ocular Angiogenic Models	ABBT0049922-26
R	3/12/2001	Email from Philip M. Deemer to sblewitt@jhancock.com@internet re MMPI Program Update	ABBT0004031-39
S	3/12/2001	Email from Diane L. D'Amico to jhm@nki.nl re M00-235 Update	ABBT0033104
T	3/12/2001	Email from Diane L. D'Amico to jhm@nki.nl re M00-235 Update	ABBT0055172-73
U	3/13/2001	Email from Jim Looman to Azmi A. Nabulsi et al. re NKI Study	ABBT0033093
W	3/14/2001	Email from Diane L. D'Amico to l.v.beerepoot@azu.nl re M00-235: Validated PD Methods	ABBT0046350
Y	3/16/2001	Email from Philip M. Deemer to Joyce L. Devault re For Overhead	ABBT0004507-09
Z	3/19/2001	Email from Jim Looman to Diane L. D'Amico re M00-235 Update	ABBT0055205-06
AA	3/19/2001	Email from Diane L. D'Amico to Willy Jansen et al. re M00-235 Update	ABBT0033096-97
AB	3/20/2001	E-mail from Deemer to Nisen	ABBT245847
AC	3/21/2001	Email from Jim Looman to Diane L. D'Amico re Restart 518 Study	ABBT0508262
AD	3/21/2001	Email from Perry D. Nisen to Philip M. Deemer re Hancock and Alcon	ABBT246501
AE	3/22/2001	Email from Paige Gjelsten to MMPI Team re MMPI Working Group Meeting Minutes: 3/8/01	ABBT300130-32, ABBT300142-44
AF	3/22/2001	Email from Philip M. Deemer to Perry D. Nisen re Hancock and Alcon	AL000403
AG	4/16/2001	E-mail from Perry D. Nisen to Azmi A. Nabulsi re:	ABBT0063627-28

Trial Exhibit	Date	Description	Bates Nos.
		DMC Project Review Meetings	
AH	5/1/2001	Monthly Highlights - Key Project Progress	ABBT0000361-65
AI	5/1/2001	ABT-518 Monthly Report, May 2001	ABBT143915.UR-20
AJ	5/2/2001	Email from Tamara L. Garavalia to Michaela L. James et al. re: ABT518	ABBT0055426
AK	5/11/2001	Oncology Status Report	ABBT0045302-304
AN	5/22/2001	Email from Perry D. Nisen to John M. Leonard re: ABT-518	ABBT0064226
AO	5/25/2001	Email from Diane L. D'Amico to Diane C. Bronson et al. re: ABT-518 Tox	ABBT0059368
AP	5/25/2001	Email from Diane L. D'Amico to Lise I. Loberg re: ABT-518 Tox	ABBT0061200
AQ	5/28/2001	Email from Diane C. Bronson to Diane L. D'Amico re: ABT-518 Tox	ABBT0057052
AR	5/28/2001	Email from Diane C. Bronson to Lise I. Loberg re: ABT-518 Tox	ABBT0155970
AS	5/29/2001	Email from Lise I. Loberg to William M. Bracken et al. re: resume ABT-518 activities: FALSE ALARM!	ABBT0157559
AT	6/4/2001	Oncology Status Report	ABBT0045296-97
AU	6/4/2001	Email from 8776893456@skytel.com to Diane L. D'Amico re: MMPI	ABBT0057906
AV	6/4/2001	Email from Thomas J. Lyons to Kenneth D. Stiles re: MMPI-Phase I Study Options	ABBT334695-97
AW	6/6/2001	Email from Lise I. Loberg to William M. Bracken et al. re: ABT-518 update	ABBT0157798-99
AX	6/7/2001	MMPI Working Group Meeting Minutes	ABBT0026340-42
AY	6/7/2001	MMPI Monthly Meeting Agenda	ABBT0045226-27
AZ	6/7/2001	MMPI Working Group Meeting Minutes	ABBT0057877-878
BA	6/14/2001	Email from Diane C. Bronson to Paige Gjelsten re: MMPI Meeting Minutes from 6/7/01	ABBT0033472-74
BB	6/21/2001	M00-235 Teleconference: Schellens Notification of Study Termination	ABBT0033089-98, 101, 104-108, 110, 113-114, 117-119
BC	7/30/2001	Email from Philip Deemer to Dan Norbeck re MMPI	ABBT245647
BG	5/17/2002	Clinical Study Report R&D/02/118 - A Phase I Escalating Multiple Dose Study Of Matrix Metalloproteinase Inhibited (ABT-518) In Patients With Advanced Cancer; ABT-518/ Protocol Moo-235	ABBT0033583-658
BH	9/15/2005	Email from Jane A. Hoff-Smith to Suzanne Lebold et al. regarding Update on ABT-518	ABBT372504
BJ	00/00/00	Proposed Program Rationalization	ABBT0018775
BK	00/00/00	Letter from Azmi to Jim re project review with upper management on Wednesday	ABBT0507866
BN	3/9/2000	MMPI A-291518 Discovery Development Candidate Approval Slide	ABBT0141509
BP	3/9/2000	Email from Aldona T. Matalonis to hg@clinphone.com@internet re Suspend Work on Abbott M99-115 IVR Project	ABBT0150827
BQ	12/1/1998	A-173259.47: A Novel Potent, Non-Opioid Analgesic	ABBT0023920-81
BR	1/15/1999	Memo to Leonard re Meeting Minutes for Analgesia Venture Portfolio Review	ABBT0005027-37

Trial Exhibit	Date	Description	Bates Nos.
BS	2/24/1999	Email from Kacos to Boyd re Analgesia Portfolio Review, with slides	ABBT0114450-519
BT	3/12/1999	Letter from McCarthy to Meyer enclosing documents for ABT-594 European Advisory Meeting	ABBT0024357-69
BU	4/1/1999	ABT-259 Transition Strategy dated April 1999	ABBT0020594-611
BV	6/1/1999	ABT-594 Development Plan dated June, 1999	ABBT0018986-0019095
BX	11/17/1999	Email from Aldona T Matalonis to Catherine K Kacos re 3 page summary sheet for ALZA	ABBT0105015-19
BY	12/21/1999	Email from James W Thomas to Fred W. Siebert et al. re 114 Sample Size	ABBT0051889
BZ	1/24/2000	Email from Christopher J Silber to Grace C Dunn et al. re Analgesia Venture Monthly Highlights	ABBT0159624
CA	1/31/2000	Abbott/NeuroSearch, Joint Research Council, January 31 - February 1, 2000	ABBT0022519-69
CB	3/1/2000	March 2000, ABT-594 Project Status Report	ABBT0004401-09
CC	4/1/2000	ABT-594 Descriptive Memorandum	ABBT0107546-551
CD	5/31/2000	Email from Marilyn J Collicott attaching site breakdown/enrollment for M99-114	ABBT0033462-67
CE	6/1/2000	June 2000, ABT-594 Project Status Report	ABBT0004422
CF	6/9/2000	Email from Marilyn Collicott to Bruce McCarthy re Updates fro M99-114 Phase IIb Meeting	ABBT0166642-43
CH	7/6/2000	Email from Tamara L Garavalia to Aldona T Matalonis et al. re M99-114 300 mcg dose group	ABBT0161395
CI	7/7/2000	Email from Steve Blewitt to Steve Cohen re Questions	ABBT0004016
CK	7/25/2000	Email from Michael Biarnesen to Aldona Matalonis re RQA Auditor Assignment for Analgesia Venture	ABBT0161644-45
CL	8/1/2000	August 2000, ABT-594 Project Status Report	ABBT0004436
CM	8/31/2000	ABT-594 Product Development Team Meeting, Minutes	ABBT0042271-75
CN	8/1/2000	ABT-594 Product Development Team Meeting, Minutes	ABBT0162183-86
CO	8/21/2000	Email from Laura Robinson to Andrea Landsberg re RE: ABT-594 Commercial Section w/Laura Robinson Input	ABBT0161930-69
CP	8/22/2000	Email from James W Thomas to Bruce McCarthy re 114 fax ae numbers	ABBT0502613
CQ	8/29/2000	Email from James Thomas to Catherine Kacos re M99-114 graph data	ABBT0080232-33
CR	8/31/2000	Email from Marilyn J Collicott to Christopher J Silber re M99-114 Extension letter	ABBT0113703-04
CS	8/31/2000	Letter from Marilyn Collicott re Protocol M99-114: A Randomized, Double-Blind, Placebo-Controlled Comparison of the Safety and Efficacy of ABT-594 to Placebo in Subjects with Painful Diabetic Neuropathy	ABBT241302
CT	9/1/2000	September 2000, ABT-594 Project Status Report	ABBT0004443-47
CU	Sep-00	September Strategy Update	ABBT0577811-34
CV	9/11/2000	Email from Christopher J Silber to Catherine K Kacos re Trip Report: Visit to Gibson, Biton, Kipnes, Hewitt	ABBT0109317-22
CW	9/26/2000	Randomized, Double-Blind, Placebo Controlled	ABBT240985-241001

Trial Exhibit	Date	Description	Bates Nos.
		Evaluation of the Safety and Efficacy of ABT-594 in Subjects with Painful Diabetic Polyneuropathy; The 594/M99-114 Study, Centralized Patient Recruitment Program	
CX	9/27/2000	Email from Andrea Landsberg to Christopher J Silber re Purdue CDA	ABBT0105034
CY	9/28/2000	Email from James W Thomas to Rebecca L Brown re ABT-594 M99-114 Slides for David with attached notes	ABBT0051892-904
DB	10/1/2000	October 2000, ABT-594 Project Status Report	ABBT0004448-54
DC	10/3/2000	Email from Andrea Landsberg to Robert J Weiland re ABT 594/963 Purdue meeting	ABBT0117782
DD	10/9/2000	Email from Marilyn J Collicott to Susan E Nunn et al. re M99-114	ABBT237155-59
DE	10/12/2000	Email from Mike Williams to Jennifer Smoter re Re: NNR documents	ABBT0118072
DF	10/24/2000	Email from Christopher J Silber to Nancy M Palbicke re Attached question list	ABBT0114445-47
DG	10/27/2000	Email from Andrea Landsberg to Christopher J Silber et al. re 594 Leiden presentation	ABBT0116819-36
DH	11/1/2000	November 2000 ABT-594 Project Status Report	ABBT0004455-59
DI	11/1/2000	Email from Robert J Weiland to Christopher J Silber re Re: Pharmacia meeting	ABBT0107163
DJ	Nov-00	November 2000 ABT-594 Status Report	ABBT0108785-790
DK	11/1/2000	Email from Bruce McCarthy to Christopher J Silber re Re: Pharmacia meeting	ABBT101893-94
DL	11/1/2000	ABT-594 Descriptive Memorandum dated November 2000	ABBT144600.UR-09
DM	11/2/2000	Email from James Sullivan to Robert J. Weiland re Re: Pharmacia meeting	ABBT0120836-37
DN	11/9/2000	Email from Bruce McCarthy to Robert J Weiland et al. re ABT-594 Partnership Strategy Meeting	ABBT0102187-88
DP	11/17/2000	PowerPoint ABT-594 Project Review	ABBT0019102-37
DQ	11/17/2000	Draft Project Review: ABT 594 Agenda	ABBT0125290-91
DR	11/22/2000	Email from Bruce McCarthy to David D Morris et al. re ABT-594 M99-114 Study Size Discussion	ABBT0109399-400
DS	11/29/2000	Email from Michael K Biarnesen to Andrea Landsberg re Re: ABT 594 forecast scenarios for BD partnering	ABBT0119091-96
DT	11/30/2000	Email from Elizabeth Kowaluk to Bryan F Cox re Re: 12/6 meeting	ABBT326427
DU	12/1/2000	December 2000 ABT-594 Project Status Report	ABBT0004660-64
DV	12/6/2000	Email from Marilyn J Collicott to Michael K Biarnesen re Re: November Monthly Project Status Report, ABT-594	ABBT242373 ABBT242394
DX	12/14/2000	Email from Marilyn J Collicott to Marian L Borgstrom et al. re Study M99-114	ABBT236951-52
DY	12/21/2000	Email from James W Thomas to Bruce McCarthy re Re: n/v rate	ABBT0079831-34
DZ	12/21/2000	Email from James W Thomas to Bruce McCarthy re Re: n/v rate	ABBT0080180-84
EA	12/21/2000	Email from Bruce McCarthy to Christopher J Silber re landsberg email	ABBT0106516

Trial Exhibit	Date	Description	Bates Nos.
EB	12/21/2000	Email from Jennifer Dart to Christopher J Silber et al. re Analgesia Internal Review Notes	ABBT0108041
EC	12/21/2000	Email from Bruce McCarthy to Christopher J Silber re Purdue presentation	ABBT0118174-203
EE	1/15/2001	Email from Bruce McCarthy to Christopher J Silber et al. re AEs for preterms - blinded look	ABBT0108884-85
EF	1/23/2001	ABT-594 Titration Optimization Initial Brainstorm Discussion, Agenda, January 23, 2001	ABBT0504097
EG	1/25/2001	Email from Jennifer Dart to Prioritization Meeting Attendees re APU Prioritization Meeting	ABBT0012433 ABBT0012454
EH	1/25/2001	Email from Christopher J Silber to James Sullivan re ABT-594	ABBT0102282-344
EI	2/1/2001	ABT-594 Monthly Report, February 2001	ABBT0000412-417
EJ	2/1/2001	Email from Michael K Biarnesen to Christopher J Silber et al. re Re: financial slides for Leiden meeting 2/2	ABBT0122953-59
EK	2/1/2001	ABT-594 Descriptive Memorandum, February 2001	ABBT246793-801
EL	2/2/2001	Project Review ABT-089 and ABT-594	ABBT0002314-469
EM	2/2/2001	Draft Project Review: ABT 594, Agenda	ABBT0125335-37
EN	2/2/2001	Email from Bruce McCarthy to Elizabeth Kowaluk re DSG	ABBT0163875-76
EO	2/14/2001	Email from Bruce McCarthy to Michael K Biarnesen et al. re Re: Consideration of IV work with ABT-594	ABBT0123130
EP	2/19/2001	Email from Bruce McCarthy to Chris Silber et al. re Scientific Strategy for ABT-594/NNR Tolerability	ABBT0115991-93
EQ	2/26/2001	Email from Bruce McCarthy to Marleen Verlinden re ABT-594 Guest Speaker and Discussion	ABBT0163931
ER	2/27/2001	Email from Marleen H Verlinden to Christopher J Silber re Re: ABT-594 partnering	ABBT0114639
ES	2/27/2001	Email from Marilyn J Collicott to stherriault@rsi-nc.com enclosing M99-114 Investigation List and Early Terminations	ABBT238329-33
ET	2/28/2001	Email from Bruce McCarthy to pandrews@sghms.ac.uk re Re: abbott visit	ABBT0163996-97
EU	2/28/2001	E-mail from Marleen Verlinden re: Dr. Andrews	ABBT0556315
EV	3/1/2001	Global Pharmaceutical Discovery, Internal Review, March 2001, Book #27, Michael Meyer, D47-W, AP9A-3	ABBT0024132-53
EW	3/5/2001	ABT-594 / Pain Strategy Decision Analysis, Core Team Meeting - Minutes, 3/5/01	ABBT298380-85
EX	3/6/2001	Pain Therapeutic Area Strategy/ABT-594 Decision Analysis, Decision Frame	ABBT0115871-76
FA	3/7/2001	E-mail from Bruce McCarthy re: Dr. Andrews meeting	ABBT0164139-40
FB	3/7/2001	Email from Bruce McCarthy to Elizabeth Kowaluk re Re: Draft Decision Frame for ABT-594/Pain Strategy DSG	ABBT297525-55
FD	3/8/2001	Email from Elizabeth Kowaluk to Marleen H Verlinden et al. re ABT-594/Pain Strategy DSG - 3/5 Meeting Minutes	ABBT298379-85
FE	3/9/2001	Email from Paul Andrews to Bruce McCarthy re answers	ABBT0164141-201

Trial Exhibit	Date	Description	Bates Nos.
FF	3/12/2001	Calendar Entry - Paul Andrews, PhD: ABT-594 Guest Speaker and Discussion	ABBT0022006-08
FG	3/12/2001	Paul Andrews, PhD, Meeting Agenda	ABBT0556316
FJ	3/28/2001	Email from Susan E Nunn to Judith S Brownell re update regarding M99-114	ABBT0081607
FK	4/1/2001	ABT-594 Monthly Report for April, 2001	ABBT0000491-96
FM	4/10/2001	Email from Elizabeth Kowaluk to Keith F Hendricks et al. re Pharma Strategy Retreat on May 2-4	ABBT323300-05
FO	5/4/2001	E-mail from Jeff Drajesk with GPRD attachment	ABBT0114968-72
FQ	5/4/2001	Email from Michael D Meyer to James Sullivan re ABT-594 Memo	ABBT335154
FT	5/10/2001	Email from James W Thomas to Yiming Zhang re 594	ABBT0080471-72
FU	5/23/2001	Email from Thomas E Woidat to Micahel K Biarnesen re Re: ABT-594 2001 Transition Budget; ABT-594 Transition Proposal	ABBT364494-496 ABBT0548527-34
FV	6/18/2001	Email from Judith S Brownell to Marilyn J Collicott et al. re RELEASE OF DATABASE, M99-114 (MC114A), ABT-594	ABBT239029
FX	7/1/2001	ABT-594 Monthly Report for July, 2001	ABBT0000612-18
FY	7/30/2001	Email from Elizabeth Kowaluk to Steve C Kuemmerle re ABT-594 DSG analysis - preview meetings	ABBT317214
GA	7/31/2001	Clinical Study Report No. R&D/01/171, A Randomized, Double-Blind, Placebo-Controller, Comparison of the Safety and Efficiency of ABT-594 to Placebo in subjects with Painful Diabetic Polyneuropathy	ABBT241331-560
GB	8/6/2001	Email from Elizabeth Kowaluk to Bruce McCarthy	ABBT326352
GC	8/21/2001	ABT-594 Pharma Executive Management Committee Review	ABBT0001974-2029
GD	8/21/2001	PEC ABT-594 Decision Analysis	ABBT0165081-96
GE	9/13/2001	Probability Assessment Worksheet: 9/13/01	ABBT127868.UR
GF	9/27/2001	ABT-594 Proposal for additional Phase IIb study	ABBT0048402-33
GG	10/1/2001	ABT-594 Monthly Report for October, 2001	ABBT0000758-63
GH	10/5/2001	Email from Marilyn J Collicott to JanLips710@aol.com re Re: (no subject)	ABBT241303
GI	10/9/2001	Email from Tamara L Garavalia to Linda M Fisher re ABT-594 Not Funded	ABBT0148334
GJ	10/23/2001	DSG Highlights: October 2001	ABBT0515808-9
GK	10/24/2001	Email from Philip M Deemer to Ake L Johansson re Update	ABBT246338-44
GL	11/16/2001	Letter from Daphne Pals to Mr. Steve Blewitt re Research Funding Agreement dated as of March 13, 2001 Termination of ABT-594	ABBT0033833
GM	6/7/2002	Email from Michael D Meyer to Christopher J Silber re DDC slides	ABBT0108742-79
GN	6/13/2002	DDC: A-429202 Neuronal Nicotinic Receptor (NNR) Agonist, Discovery Development Candidate	ABBT0023982-24053
GO	6/27/2002	Email from Bruce McCarthy to Marleen H Verlinden re Questions re goals	ABBT0546449-50
GP	12/10/2002	GPRD PowerPoint Presentation	ABBT0105563-86
GR	00/00/00	Probability Assessment Worksheet	ABBT0047907-08

Trial Exhibit	Date	Description	Bates Nos.
GS	00/00/00	Letter to M99-114 study cites	ABBT0082749
GT	00/00/00	ABT-594 PowerPoint Slides (Development Plan)	ABBT0102966-68
GY	00/00/2001	2001 Plan Key Statistics Pass II	ABBT0037544
GZ	00/00/2001	2001 APU Development Cost Summary	ABBT366059
HA	11/8-9/2000	E-mail string from Bruce McCarthy	ABBT0110505-6
HB	11/30/2000	Email from Michael Biarnesen to Christopher Silber re 594 sales/cost estimate slide	ABBT0122385-86
HC	1/23/2001	Project Status from Jim Tyree's Expanded Staff Meeting	ABBT0128117-18
HD	2/13/2001	Email from Marilyn Collicott to stherriault@rsi-nc.com	ABBT242681-86
HE	10/28/2000	Investigational New Drug (IND) Annual Report (Reporting Period October 29, 1999 - October 28, 2000)	ABBT236676-729
HF	2/6/2001	Summary of Success Probabilities by Project and Franchise Portfolio Analysis (January 2001)	ABBT0012431-32
HG	8/21/2001	ABT-594 Decision Analysis - Pharmaceutical Executive Management Committee Review	ABBT0022081-92
HH	10/10/2001	Email from Bruce McCarthy to Michael Biarnesen re ABT-594 Update	ABBT245657
HI	3/5/2001	ABT-594 Decision Analysis - Core Team Meeting	ABBT329247-251
HJ	5/25/2000	Letter from Marilyn Collicott to Michael Hoffstetter	ABBT242154
HK	9/3/1999	Email from Christopher to Rosemarie Waleska re Advice	ABBT0159274
HL	3/00/01	ABT-594 Monthly Report	ABBT0000451-56
HM	10/19/2001	Email from Philip M. Deemer to Bruce McCarthy re: ABT-594 Call	ABBT245857
HN	5/00/00	Cholinergic Channel Modulation	ABBT0021817-860
HO	10/10/2001	Email from Bruce McCarthy to Michael Biarnesen	ABBT245657-660
HP	9/27/2001	ABT-594 - PEC Review Book: Proposal for additional study and background (nonstandard format)	ABBT113285.UR-315.UR
HQ	7/6/2000	ABT-594 2001 Update, Clinical Studies	ABBT144619.UR-20.UR
HR	Apr-99	ABT-773 Project Status Report	ABBT005056-63
HS	5/1/1999	ABT-773 Project Status Report for May 1999	ABBT004844-50
HT	Jun-99	Top 10 Issues	ABBT0017678-79
HU	8/1/1999	ABT-773 Project Status Report dated August 1999	ABBT0004627-36
HV	3/16/2000	Email from Tim Vanbiesen to Elizabeth Kowaluk re ABT-773 Dosing Strategy Kick-off Meeting	ABBT305783-84
HW	6/1/2000	ABT-773 Ketolide Antibiotic 2000 Strategic Marketing Plan dated June 2000	ABBT0570747-70
HX	6/5/2000	ABT-773 Descriptive Memorandum dated May 2000	ABBT246466-71
HZ	9/13/2000	Email from Gregor Bosco to Carol S. Meyer re ABT-773 Dev. Plan	ABBT0557552-57
IB	11/1/2000	November 2000 - "Top" Issues	ABBT0017833
IC	11/20/2000	Email from Belinda Hightower to Phyllis Kincaid re Clinical Hold	ABBT0556812
IF	11/28/2000	Email from Jeanne M. Fox to Lawrence E. Roebel et al. re Executive Summary of ABT-773 End-of-Phase 2 Mtg w/FDA	ABBT0558150
IG	11/29/2000	Email from Jeanne M. Fox to Rod M. Mittag et al. re Slides for 12/5 Meeting	ABBT0556816-22

Trial Exhibit	Date	Description	Bates Nos.
IH	Dec-00	December 2000 Top Issues	ABBT0017554-55
II	12/5/2000	ABT-773 Portfolio Review	ABBT0577000-168
IJ	1/1/2001	ABT-773 Monthly Report	ABBT214449
IK	1/1/2001	January 2001 ABT-773 Project Status Report	ABBT222821-27
IL	2/1/2001	ABT-773 Monthly Report	ABBT0000387-99
IN	2/12/2001	ABT-773 Update, [Monthly Report for [February 12, 2001]	ABBT0576828-71
IO	2/12/2001	ABT-773 Update February 12, 2001	ABBT205042-46
IP	2/12/2001	ABT-773 Update February 12, 2001	ABBT205047-87
IQ	2/14/2001	Email from Jeanne M. Fox to James Steck re Studies to Meet Pediatric Rule Requirements	ABBT0568172
IR	2/22/2001	Email from Eugene X. Sun to Stan Bukofzer re 773 Material	ABBT204959-5046
IS	3/1/2001	ABT-773 Monthly Report for March 2001	ABBT0000428-38
IT	3/7/2001	Abbott Portfolio Review - March 7-9, 2001 re ABT-773	ABBT0013203-14
IU	3/19/2001	ABT-773 Update March 19, 2001	ABBT228099-137
IV	3/27/2001	Email from Thomas E. Woidat to William A. Brown re 773 Presentation	ABBT363844
IW	3/31/2001	Email from Marleen H. Verlinden to Eugene X. Sun re ABT-773	ABBT0571202-03
IX	Apr-01	ABT-773 April Update	ABBT0000468-78
IY	4/12/2001	ABT-773 Ph III Decision Project	ABBT116508ur-17ur
IZ	4/12/2001	Email from Thomas E. Woidat to Jennifer Dart re: Portfolio Analysis - Update with APU budgets	ABBT357615-20
JA	5/2/2001	Memo from Jeff Leiden to Stan Bukofzer, John Leonard and Eugene Sun re: First Call Report	ABBT0573479-83
JB	6/17/2001	Email to Hendricks, et al. re: Final copy of 773 decision analysis planned presentation	ABBT224941-82
JC	6/20/2001	Email from Carol S. Meyer to Ake L. Johansson, et al., re: ABT 773 Taisho/Abbott Meeting - June 26th	ABBT229367-9448
JE	7/1/2001	ABT-773 Monthly Report	ABBT0000589-98
JG	9/27/2001	Email from Carol S. Meyer to Stan Bukofzer re: ABT 773 2002 Plan Powerpoint slides	ABBT229605-09
JH	Oct-01	ABT-773 Monthly Report	ABBT0000726-35
JI	10/8/2001	Abbott Portfolio Review 2002 Plan	ABBT228798-837
JJ	12/14/2001	Email from John M. Leonard to Stan Bukotzer re: December 12 PEMC Meeting Minutes	ABBT209485-86
JK	12/17/2001	Email from Thomas J. Lyons to Stan Bukotzer re: JH Annual Progress Report & Y/E LBE	ABBT0009384-88
JL	1/3/2002	Email from Stan Bukofzer to John M. Leonard, Eugene Sun re: 773 presentation	ABBT220928-53
JM	1/3/2002	Email from Eugene X. Sun to John M. Leonard, et al., re: 773 memo to Miles	ABBT231340-42
JN	1/4/2002	Email from Stan Bukofzer to Jeff M. Leiden, et al., re: ABT 773 Memo	ABBT220660-72
JQ	2/1/2002	ABT-773 Monthly Report	ABBT0000918-927
JR	2/2/2002	E-mail from Tina Ventura re: 773 communications strategy	ABBT229753-70
JS	2/4/2002	Email from Jeff M. Leiden to Thomas J. Lyons re: 2002 773 LBE	ABBT224544-51
JT	2/9/2002	Email from Stan Bukofzer to Jeff M. Leiden re: ABT	ABBT225309-23

Trial Exhibit	Date	Description	Bates Nos.
		773 documents requested	
JU	7/11/2002	Email from Stan Bukofzer re ABT-773 Communication	ABBT203446-48
JV	9/10/2002	ABT-773 Lessons Learned Overview	ABBT222829-42
JW	Jul-04	June Highlights Memo (global outlicensing)	ABBT248011-12
JX	00/00/00	Abbott Compound Development Summaries	ABBT0094631-61
JY	3/8/2000	ABT-773 Clinical Developmnet Optimization: Analhsis of a 150mg Dose for Bronchisits and a 5-day Course of Therapy for CAP	ABBT11376.UR-427.UR
JZ	7/9/2001	Email from Steve Kuemmerle to Stan Bukofzer re ABT-773 Analysis	ABBT210063-98
KA	6/11/2003	Pain Therapeutics Program Overviews (PEC Meeting)	ABBT0102860-71, 916-19
KB	7/29/2003	Kowaluk e-mail with attached pain portfolio profile re: ABT-894	ABBT323817-30
KC	5/1/2005	ABT-894 Scientific Advistory Counsel Doc	ABBT0080815-34
KD	11/12/2006	Suzanne Lebold e-mail string re: recommend no ABT-594 outlic due to 894	ABBT371710-15
KE	1/12/2006	Email from Kevin Constable to Suzanne Lebold	ABBT279668-73
KJ		Email from Lise Loberg to William Bracken re ABT-894 IND	ABBT0155807
KK	12/14/1998	Email from Bruce McCarthy to David Ross et al re Letter to the FDA	ABBT0116076-77
KL	6/23/1999	Alternative Funding Initiatives	AL000120-131
KM	1/12/2000	Email from Thomas Freyman to Philip Deemer	ABBT246802
KO	2/7/2000	Email from Philip Deemer to Erik Zimmer et al re Hancock	ABBT245855
KR	4/5/2000	Email from Robert Weiland to Rosemarie Waleska et al re Hancock R&D Funding	ABBT246414-15
KT	6/7/2000	Email from Philip Deemer to Steve Cohen re John Hancock/Abbott Funding Collaboration	AL000198-99
KW	7/24/2000	Email from Frank Loughery to Philip Deemer et al re Hancock Deal	AL002064
KZ	8/4/2000	Email from Philip Deemer to Barbara Powell re John Hancock Slide describing John Hancock company	AL000099-102
LA	8/14/2000	Email from Steve Cohen to Julia Bouffard et al re John Hancock/Miles meeting	AL000137
LD	8/25/2000	Email from Philip Deemer to John Leonard re Hancock	AL000983
LH	10/16/2000	PPD Plan Review	ABBT0155579-80
LI	10/17/2000	Email from Daphne Pals to Brewster Lee et al re Research Funding Agreement	JH004385-461
LN	11/30/2000	MMPI Working Group Meeting Minutes	ABBT0045277-78
LO	12/1/2000	Fax from Philip Deemer to Arthur Higgins re Hancock	AL001946
LP	12/5/2000	Minutes from the D46R Senior Staff Meeting	ABBT0140316
LQ	12/15/2000	Memorandum from Steve Cohen to Dr. Jeffrey Leiden et al re 2001 Plan	ABBT0007157-74
LR	12/21/2000	2001 Plan Assumption Memo - Pass III	ABBT112985.UR-3029.UR
LS	1/11/2001	MMPI Working Group Meeting Minutes - Objective:	ABBT0045264-69

Trial Exhibit	Date	Description	Bates Nos.
		Overall Project Update	
LT	1/22/2001	Forecast Methodology and Assumptions Early Oncology Pipeline Portfolio Analysis January 2001	ABBT0012938-69
LV	1/25/2001	Email from Elizabeth Koweluk to Steve Kuemmerle et al re Summary of Success Probabilities	ABBT301935-41
LW	1/26/2001	Analgesia Venture 2001 Plan - Revised 1/26/01 to John Leonard et al	ABBT0503356-62
LX	1/26/2001	Analgesia Venture 2001 Plan - Revised 1/26/01 to John Leonard et al	ABBT144630.UR-46
LY	1/30/2001	John Hancock Life Insurance Company Research Funding Agreement - Prepared from Draft of 1/23/01	ABBT0158779-92
MA	3/1/2001	Memorandum from Xavier Frapaise to John Arnott et al re Development Portfolio Review Meeting - March 7-9	ABBT0164029-31
MB	3/2/2001	Memorandum from Matt Russell to Bob Funck et al re 2001 Plan Final Reference Package	ABBT0037509-608
MD	3/12/2001	Email from William Adams to Brewster Lee final clean and redlined versions of the Research Funding Agreement.	JH010033-142
ME	3/13/2001	J. Hancock Research Funding Agreement for Abbott: Executive Summary of March 13, 2001 Agreement	AL002066-69
MF	4/1/2001	Summary of R&D Projects - 2001 April Update	ABBT140276-77.UR
MG	4/1/2001	Email from Elizabeth Kowaluk to Steve Kuemmerle et al re Success Probabilities	ABBT317221-39
MH	4/12/2001	MMPI Working Group Meeting Minutes	ABBT0026337-38
MI	4/12/2001	MMPI Monthly Meeting Agenda Objectives: To Review MMPI Project Status	ABBT0045243-45
MJ	4/20/2001	Portfolio Analysis of 2001 Abbott Global Pharmaceutical Development Assets	ABBT127558.UR-652.UR
MK	4/26/2001	Email from Philip M. Deemer to Ron Gerlach re John Hancock Royalty Scenario	ABBT245877-79
ML	4/27/2001	Portfolio Analysis of 2001 Abbott Global Pharmaceutical Development Assets, Addendum: Use of Productivity Index in Portfolio Selection	ABBT326405-10
MN	5/20/2001	Global Pharmaceutical Research & Development, 2001 April Update, Dr. Jeff Leiden Follow-Up Package	ABBT0037615-16
MO	5/12/2001	Email from Perry D. Nisen to Azmi A. Nabulsi re MMPI	ABBT0063636
MP	5/31/2001	Email from Diane L. D'Amico to Lise I. Loberg re MMPI Activities	ABBT0059672
MQ	6/18/2001	Email from Thomas Woidat to Kenneth Stiles re Terminated Development Projects (Draft)	ABBT352510-15
MR	6/27/2001	Email from John Leonard to Vaseern Iftekhar et al re Terminated Development Projects	ABBT334140-45
MS	7/29/2001	Email from Robert Funck to Thomas Lyons et al re Hancock - 2002	ABBT0008946-48
MT	8/22/2001	Email from Philip M. Deemer to Ake L. Johansson re Executive Briefing, Global Licensing and Business Development	ABBT246374-409
MU	8/27/2001	Email from Philip M. Deemer to Ake L. Johansson re Update of Priorities	ABBT246324-28

Trial Exhibit	Date	Description	Bates Nos.
MV	9/28/2001	Email from Denise L. Carlson to Fusako H. Bowering re Template for Outlicensing Update	ABBT245788-805
MY	12/6/2001	Memo from John M. Leonard to Jeff Leiden re Monthly Highlights - November 2001	ABBT0003473-77
NA	12/20/2001	Handwritten Note with various attachments	ABBT0007038-54
NB	12/31/2001	Memo from Philip M. Deemer to Pamela Demain re Licensing Opportunities	ABBT246490-92
NC	12/13/2002	Memo from James L. Tyree to Jeff Leiden re January 2002 Highlights	ABBT247161-63
NE	4/15/2002	Email from John M. Leonard to Thomas J. Lyons et al. re Hancock Response	ABBT225709-10
NG	5/30/2002	2002 Update, Global Pharmaceutical Research & Development	ABBT0011680-27
NJ	11/7/2002	Memo from James L. Tyree to Jeff Leiden re October 2002 Highlights; Tyree memo dated 4/7/03 re March 2003 highlights; Leonard memo dated 2/13/04 re January 2004 highlights; Tyree memo dated 6/16/04 re May 2004 highlights; Poulos memo dated 8/15/05 re July 2005 highlights; Poulos memo dated 9/12/05 re August 2005 highlights	ABBT0518029-34, ABBT336134-35, ABBT103633.UR, ABBT103643.UR, ABBT104009.UR-10.UR, ABBT336155, ABBT336157, ABBT352502-04
NK	12/20/2002	Letter from Tom Lyons to Steve Blewitt re Research Funding Agreement dated as of March 13, 2001, (a) 2002 Program Status Report and Related Cost Summary, (b) 2003 Preliminary Annual Research Plan	AL001469-79
NL	1/30/2003	Email from Thomas J. Lyons to Jeff M. Leiden re John Hancock Update	ABBT0007586-89
NX	9/28/2004	Email from Michelle L. Campbell to Chris Martinez re Status of Documents Available for Review re John Hancock Audit	ABBT0000255-56, ABBT0126645-47
NY	10/6/2004	Email from Chris Martinez to Michelle Campbell re Status of documents available for review	ABBT0126645-47
OB	12/8/2004	Email from Karen Collari Troake to Stephen D'Amore	ABBT0000151-54
OD	1/4/2005	Email from Stephen D'Amore to Michelle Campbell re John Hancock/Abbott	ABBT0126684-87
OF	1/10/2005	Global Pharmaceutical Research & Development, Hancock Collaboration, Spending by Program Chart	ABBT148376.UR, ABBT148382.UR, ABBT148379.UR, ABBT148381.UR, ABBT__0306.UR [?], ABBT0008528-30, ABBT348223, ABBT0004602
OG	1/20/2005	Email from Chris Martinez to Michelle L. Campbell re Copies of Documents	ABBT0126734
OH	1/26/2005	Email from Michelle L. Campbell to Mark Hair re Copies of Documents Flagged Today	ABBT0126490-92
OI	1/26/2005	Email from Michelle L. Campbell to Kenneth A. Wittenberg re Copies of Documents Flagged Today - Privileged and Confidential	ABBT0126767-71
OM	2/23/2005	Email from Stephen D'Amore to Michelle Campbell	ABBT0126964-65

Trial Exhibit	Date	Description	Bates Nos.
OO	3/14/2005	Medical Products Group Portfolio Management Process	ABBT269161-210
OP	3/15/2005	Email from Michelle Campbell to Mark Hair	ABBT0000280-84
OT	3/25/2005	Email from Michelle L. Campbell to Mark Hair re John Hancock Audit	ABBT0000270-71
OX	11/7/2005	Abbott Pharmaceutical R&D Metrics Analysis	ABBT248441-547
OY	1/1/2006	2006 Portfolio Sales Data	ABBT248659-929
OZ	1/20/2006	Letter from Suzanne A. Lebold to Stephen J. Blewitt re Research Funding Agreement Between Abbott Laboratories and John Hancock dated March 13, 2001	ABBT0026105-16
PA	3/23/2006	PPG R&D Review	ABBT0047220-88
PE	00/00/00	Abbott Laboratories PPD R&D Alternative Financing Analysis John Hancock Funding Scenarios	ABBT0006861-64
PF	00/00/00	80% Power Curve for Varying Effect Size for Neuropathic Pain Based on M98-833 and Gabapentin Results	ABBT0051885-88
PG	00/00/00	Internal memorandum from Steve Cohen to Jeff and Arthur attaching Hancock package with three additional schedules	ABBT006748-68
PH	00/00/00	Initial Portfolio Prioritization	ABBT0155581-87
PI	00/00/00	Growing and Enhancing World-Class Global Research and Development at Abbott, New Organizational Plan Roll-Out PowerPoint Presentation	ABBT0162922-46
PJ	00/00/00	Memo from Azmi to Jim re Project Review	ABBT0507866
PK	00/00/00	2001 APU GPRD, Hancock Deal	ABBT148440.UR ABBT148555.UR ABBT148543.UR
PL	00/00/00	2006 LRP Forecast Submission Workbook	ABBT299286-97
PO	00/00/00	Nominal and Expected Sales Forecast	JH002314-17
PT	00/00/00	Initial Portfolio Prioritization	ABBT0155602-08
PU	00/00/2001	Division Incentive Plan Goals - 2001 DIP	ABBT354864-65
QS	00/00/00	GPRD APU - J. Leiden Questions	ABBT037609-14
RP	4/14/2004	CMR International Success Rates	ABBT308584-645
RS	11/21/2002	ABT-510 Monthly Report, Post Oct 19	ABBT0007270-72
RX	3/21/2001	Email from Thomas Woidat to Mike Higgins re Proposed APU Target Adjustments	ABBT364018-20
RY	00/00/00	Cholinergic Channel Modulator (ABT-594) 2000 AGU Development cost Summary	ABBT338037, ABBT0116305, ABBT366059
RZ	00/00/00	Abbott-John Hancock Funding Collaboration	AL000059-76
SA	10/8/2001	ABT-594 Decision Analysis, Update: ABT-594 Intermediate Dose (75-125 mcg) Ph. IIb Study	ABBT0165097-104
SD	4/20/2005	Email from Kenneth Wittenberg to Amy Potthoff, et al re Meeting re Hancock audit	ABBT0036399 ABBT0008949
SE	1/21/2005	Email from Stephen D'Amore to Michelle Campbell re Documents request in July 2004 and Re-Requested on December 17, 2004	ABBT0126735-36
SK	1/16/2001	Email from Marilyn Collicott to Jschanzenback@rsi-nc.com re Meeting Today	ABBT242693-99
SL	8/7/2000	Email from Andrea Landsberg to Bruce McCarthy re 594 Development Plan	ABBT0109806-39

Trial Exhibit	Date	Description	Bates Nos.
SM	10/3/2000	Email from Bruce McCarthy to Andrea Landsberg re ABT-594/963 Purdue Meeting	ABBT0107081
SN	00/00/00	Portfolio Review Meeting, March 7-9, 2001	ABBT0092919-21
SO	9/00/2000	Pharmaceuticals Strategy Update	ABBT0155493-512
SP	9/00/2000	Pharmaceuticals Strategy Update	ABBT0577835-54

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